

MONTANA VISIBILITY PROTECTION PLAN

STAKEHOLDER MEETING #1

October 21, 2005 - Meeting Summary

Department Staff:

Bob Habeck
John Coefield
Deb Wolfe
Bob Jeffrey
Julie Merkle

Present:

Steve Wright
Hal Robbins
Bernie Gieser
Dave Galt
Joe Scheeler
Don Allen

Phone Conference:

Bill Michaels
Dexter Busby
Dana Mount
Jeff Briggs
Jim Parker
Thomas Dzomba
Jay Littlewolf
Randy Ashley

BACKGROUND INFORMATION

PowerPoint Slide Presentation on Visibility – Bob Habeck

See PPT at

http://www.deq.mt.gov/AirQuality/ARM_Permits/Final_Visibility_02.pdf.

Dave Galt: What is the timetable for the development and implementation of this rule?

Department: Visibility plans are due December 2007. A more detailed timeline graph is included in the PowerPoint presentation (see above).

Don Allen: Will the PowerPoint presentation be available on the DEQ website?

Department: Yes- see above.

Dave Galt: Are plans submitted on a state-by-state or regional basis?

Department: Each state is responsible for submitting an individual plan for visibility.

Don Allen: Visibility stakeholders include many interests and industries. Will you invite them to participate as well?

Department: The Department is focusing only on major sources and open burning as sources of visibility impairment at this time. Those invited to participate in the stakeholder group represent those activities. The stakeholder group is an informal, pre-rulemaking group. The Department intends to publish public notice during the course of rulemaking, so everyone has an opportunity to participate in the final development of regulations.

PROPOSED CONTROL STRATEGIES

Hal Robbins: What does “20% worst days” represent? How did you arrive at that number?

Department: Current condition 20% worst days are determined by the monitoring data from the IMPROVE sites that represent each Class I area. The PM concentration of each measured species is converted to an extinction coefficient using the extinction efficiency factor for each species. The extinction coefficients are summed to determine the overall extinction measurement for each sample day. The natural condition 20% worst days are calculated using natural condition PM data from a 1991 NAPAP study.

Bernie Gieser: Has the Department compiled a BART-eligible source list?

Department: The Department is compiling a list of sources that meets the definition of BART-eligible source at 40 CFR 51.301.

Dana Mount (Comment): North Dakota is finalizing a preliminary list of BART-eligible sources. North Dakota is currently working on the status of a refinery facility.

Hal Robbins: Does the 5-year implementation for BART apply only to EGUs? Are any Montana EGUs subject to BART?

Department: All BART subject sources will be on the same schedule. DEQ currently expects at least three EGUs in Montana to be BART eligible.

Dave Galt: Does the Department intend to extend regulatory efforts to agricultural burning in eastern Montana?

Department: The Department intends to complete this first phase of the visibility control strategy before assessing the visibility impairing effects of other source emissions, including agricultural burning in eastern Montana.

MODELING PROTOCOL

Hal Robbins: Will modeling be limited to the impact of a source on the nearest mandatory class I federal area? Will you model each source separately? Will 0.5 be the deciview threshold? How large is the modeling domain? Will you use the modeling results for more than visibility?

Department: The Department intends to model on a source-by-source basis and extend the modeling to include any mandatory class I federal areas at which the source has a visibility impact equal to or exceeding 0.5 deciview. Because visibility impairment includes all mandatory class I federal areas, situations may exist in which a source affects an area in another state. The Department intends to use the model for other source regulatory applications, such as NSR.

NEXT STEPS

Don Allen: It appears the Department intends to begin modeling to determine visibility impacts before rule initiation. Do you also intend to notify all interested parties of this pre-rulemaking modeling?

Department: The modeling conducted prior to the final adoption of rules is preliminary and the Department intends to continue the stakeholder process, although anyone may attend and observe any of the stakeholder meetings. The Department will publish public notice consistent with the Montana Administrative Process for rulemaking when the formal process begins. The Department will conduct final modeling and the process of making BART determinations following final rule adoption.